



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 PEARL STREET, SUITE 20-100
NEW YORK, NY 10004-2616

January 11, 2024

By ECF

Hon. Kenneth M. Karas
United States District Court United
States Courthouse
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*,
12-CV-6421 (KMK)

Dear Judge Karas:

The Securities and Exchange Commission ("SEC") writes to address its current views based on Mr. Bronson's December 1, 2023 Letter and his more recent submissions, DE 572, 573, et al., as ordered by the Court. While the SEC continues to have concerns about the Bronsons' compliance with certain Court Orders, the parties are actively discussing if we may be able to resolve these concerns without further Court intervention.

To that end, the parties expect to submit a proposed order for the Court's consideration in the next few days regarding the contours of the Court's asset freeze and its Orders regarding notice of cash receipts and disbursements, which should make them more functional and transparent. Additionally, Defendant Bronson has advised that he intends to make several significant payments in the near term. Thus, consistent with the Court's guidance to take a measured approach, the SEC proposes that the parties continue to discuss resolutions to the outstanding issues and provide a further update within 45 days.

Respectfully submitted,
s/ Maureen Peyton King